



**DEPARTMENT OF THE ARMY**  
**UNITED STATES ARMY LEGAL SERVICES AGENCY**  
**9275 GUNSTON ROAD**  
**FORT BELVOIR, VIRGINIA 22060-5546**

REPLY TO  
ATTENTION OF  
JALS-RL/IP  
Regulatory Law Office

January 29, 2018

**Via Electronic Filing**

Ms. Jocelyn D. Boyd  
Chief Clerk  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, SC 29211

**Re: Docket No. 2017-370-E; In Re: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc. for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for a prudency determination regarding the abandonment of the V.C. Summer Units 2 & 3 Project and associated merger benefits and cost recovery plans**

Dear Ms. Boyd:

Please find enclosed the Petition to Intervene on behalf of the United States Department of Defense and all other Federal Executive Agencies. If there are any questions about the filing, I can be reached at (703)614-3918 or [emily.w.medlyn.civ@mail.mil](mailto:emily.w.medlyn.civ@mail.mil).

Very truly yours,

*s/ Emily W. Medlyn*

Emily W. Medlyn

Enclosure

cc: Those listed in the certificate of service

## STATE OF SOUTH CAROLINA

## (Caption of Case)

In Re: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc. for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for a prudency determination regarding the abandonment of the V.C. Summer Units 2 & 3 Project and associated merger benefits and cost recovery plans

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET  
NUMBER: 2017 - 370 - E

(Please type or print)

Submitted by: Emily W. MedlynSC Bar Number: 70501Address: 9275 Gunston RoadTelephone: (703)614-3918Suite 1300 (JALS-RL/IP)Fax: (703)806-0123Fort Belvoir, VA 22060-5546

Other: \_\_\_\_\_

Email: emily.w.medlyn.civ@mail.mil

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Print Form

Reset Form

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 2017-370-E**

In Re: Joint Application and Petition of )  
South Carolina Electric & Gas Company )  
and Dominion Energy, Inc. for review and )  
approval of a proposed business combination )  
between SCANA Corporation and )  
Dominion Energy, Inc., as may be required, )  
and for a prudency determination regarding )  
the abandonment of the V.C. Summer Units )  
2 & 3 Project and associated merger benefits )  
and cost recovery plans )

**PETITION TO INTERVENE**  
**OF THE UNITED STATES**  
**DEPARTMENT OF DEFENSE**  
**AND ALL OTHER FEDERAL**  
**EXECUTIVE AGENCIES**

Pursuant to the Public Service Commission's Regulation 103-825, the United States Department of Defense and all other Federal Executive Agencies ("DoD/FEA"), by and through its legal counsel, hereby requests that it be granted leave to intervene in the above captioned matter, and in support thereof states:

1. DoD/FEA has a substantial interest in this proceeding because it owns and operates numerous facilities and buildings within South Carolina Electric & Gas Company's (SCE&G) territory and annually purchases a substantial amount of electric and gas services from SCE&G. No other party can adequately represent the federal government's interest.

2. The Federal Property and Administrative Services Act, 40 U.S.C. § 501(c) authorizes the United States General Services Administration ("GSA") to represent consumer interests of the Federal Executive Agencies in proceedings before state regulatory bodies. Furthermore, GSA may delegate to DoD the authority to represent all Federal Executive Agencies in a proceeding involving a public utility before a regulatory

body when DoD and GSA agree that representation by DoD is in the best interests of the Federal Government. 15 FR 8227 (3)(k)(2) (1950).

3. The attorney authorized to represent DoD/FEA in this proceeding and take service of all documents is:

Emily W. Medlyn  
General Attorney  
U.S. Army Legal Services Agency  
Regulatory Law Office (JALS-RL/IP)  
9275 Gunston Road  
Fort Belvoir, Virginia 22060-4446  
Telephone: (703) 614-3918  
Facsimile: (703) 806-0123  
Email: [emily.w.medlyn.civ@mail.mil](mailto:emily.w.medlyn.civ@mail.mil)

WHEREFORE, the United States Department of Defense and all other Federal Executive Agencies requests that it be granted leave to intervene as a full party in this proceeding, with all rights attendant to full party status.

Respectfully submitted,

s/ Emily W. Medlyn  
Emily W. Medlyn  
SC Bar #70501  
General Attorney  
U.S. Army Legal Services Agency  
Regulatory Law Office (JALS-RL/IP)  
9275 Gunston Road  
Fort Belvoir, Virginia 22060-4446  
Telephone: (703) 614-3918  
Facsimile: (703) 806-0123  
Email: [emily.w.medlyn.civ@mail.mil](mailto:emily.w.medlyn.civ@mail.mil)

January 29, 2018

### **CERTIFICATE OF SERVICE**

I, Emily W. Medlyn, hereby certify that the attached Petition to Intervene is a true and correct copy of the document being filed with the South Carolina Public Service Commission on January 26, 2018 to all persons at the addresses listed in the Official Service List for Docket 2017-370-E by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid.

s/ Emily W. Medlyn  
Emily W. Medlyn